

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LANCE THORNTON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 1:23-cv-164
	)	
STEVEN DELUCA, JOHN DOE 1,	)	JUDGE CATHY BISSOON
JOHN DOE 2, JOHN DOE 3,	)	
JOHN DOE 4, JOHN DOE 5,	)	<i>(Electronic Filing)</i>
JOHN DOE 6, JOHN DOE 7,	)	
JOHN DOE 8, JOHN DOE 9,	)	
JOHN DOE 10, AND CITY OF ERIE,	)	
PENNSYLVANIA,	)	
	)	
Defendants.	)	

**MOTION FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, Defendant DeLuca, by his attorneys, Eric G. Olshan, United States Attorney for the Western District of Pennsylvania, and Kezia O. L. Taylor, Assistant United States Attorney, respectfully moves the Court to issue an Order extending the time within which Defendant may respond to Plaintiff's Motion for Expedited Discovery by seven (7) days, from July 5, 2023, to July 12, 2023. In further support of this Motion, Defendant states as follows:

1. On June 23, 2023, Plaintiff filed a Motion for Expedited Discovery. ECF No. 15.
2. Pursuant to this Honorable Court's Chambers Procedures, II. Motions Practice, F. Scheduling, Defendant's response to Plaintiff's non-dispositive Motion is due on July 5, 2023.
3. Defendant requests an extension of time because the undersigned counsel was out of the office on leave when Plaintiff's Motion was filed.

4. Accordingly, Defendant requests a brief seven (7) day extension of time to file its response to Plaintiff's Motion for Expedited Discovery.

5. This is the first request for an extension of time to respond to Plaintiff's Motion for Expedited Discovery, ECF No. 15, and undersigned counsel does not believe that said request will unfairly prejudice Plaintiff or unduly delay the litigation.

WHEREFORE, Defendant respectfully requests an extension of seven (7) days, or until July 12, 2023, in which to respond to Plaintiff's Motion for Expedited Discovery.

A proposed Order is attached.

Respectfully submitted,

ERIC G. OLSHAN  
United States Attorney

/s/ Kezia Taylor  
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*Counsel for Defendant DeLuca*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of June, 2023, a true and correct copy of the within Motion for Extension of Time to Respond to Plaintiff's Motion for Expedited Discovery was served by electronic filing, upon the following:

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/s/ Kezia Taylor  
KEZIA O. L. TAYLOR  
Assistant U.S. Attorney